

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEM
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBIT:

JOINT MOTION TO DISMISS DEFENDANTS WITH PREJUDICE

Plaintiffs in the cases listed on the attached Exhibit A and Defendants C.R. Bard, Inc. (“Bard”) and Sofradim Production SAS¹ and Tissue Science Laboratories Limited² (collectively the “Covidien Entities”), to the extent they are named as Defendants, advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, plaintiffs, Bard and the Covidien Entities jointly move the court to dismiss Bard and the Covidien Entities with prejudice, and terminate Bard and the Covidien Entities from the docket in the actions on the attached Exhibit A, parties to bear their own costs.

Respectfully:

¹ Sofradim Production SAS includes any incorrect or incomplete spellings of this Defendant, including Sofradim Corporation, Sofradim Corp., Sofradim Production, and Sofradim Production, SAS.

² Tissue Science Laboratories Limited includes any incorrect or incomplete spellings of this Defendant, including Tissue Sciences Laboratories, Tissue Science Laboratories Ltd., Tissue Science Laboratories, Inc., Tissue Science Laboratories, Limited and Tissue Science Laboratories, Ltd.

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Dated: September 11, 2018

EXHIBIT A –SANDERS VIENER GROSSMAN, LLP

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:16-cv-06756	Vickie Portier v. C.R. Bard, Inc., et al.
2:16-cv-06758	Nancy Anderson v. C.R. Bard, Inc., et al.

CERTIFICATE OF SERVICE

I hereby certify that on September 11, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Richard B. North, Jr.